

FILED *SGUM*  
4-30-15  
APR 30 2015  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WALTER PACHECO TREJOS,  
(a/k/a "Lucas Arqui");  
ANDRES MAURICIO LEBRE  
ALVARADO,  
(a/k/a "AM"); and  
JUAN CARLOS ESPINOZA DE LOS  
MONTEROS DEL RINCON,  
(a/k/a "JC")

UNDER SEAL

15 CR 56

**JUDGE WOOD**

**MAGISTRATE JUDGE BROWN**

Violations: Title 21, United States Code, Sections 846, 963, and Title 18, United States Code, Section 1956(h).

**SUPERSEDING INDICTMENT**

**COUNT ONE**

The SPECIAL JANUARY 2015 GRAND JURY charges:

Beginning no later than in or about 2009, and continuing until in or about April 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WALTER PACHECO TREJOS (a/k/a "Lucas Arqui"),  
ANDRES MAURICIO LEBRE ALVARADO (a/k/a "AM"), and  
JUAN CARLOS ESPINOZA DE LOS MONTEROS DEL RINCON  
(a/k/a "JC"),

defendants herein, did conspire with Heriberto Zazueta Godoy (a/k/a "Capi Beto"), Individual A, Individual B, Individual C, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with

intent to distribute and distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

## COUNT TWO

The SPECIAL JANUARY 2015 GRAND JURY further charges:

Beginning no later than in or about 2009, and continuing until in or about April 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WALTER PACHECO TREJOS (a/k/a "Lucas Arqui"),  
ANDRES MAURICIO LEBRE ALVARADO (a/k/a "AM"), and  
JUAN CARLOS ESPINOZA DE LOS MONTEROS DEL RINCON  
(a/k/a "JC"),

defendants herein, did conspire with Heriberto Zazueta Godoy (a/k/a "Capi Beto"), Individual A, Individual B, Individual C, and with others known and unknown to the Grand Jury, to knowingly and intentionally import controlled substances into the customs territory of the United States from a place outside the United States, namely, Mexico; to import controlled substances into the United States from a place outside the United States, namely Mexico; and to manufacture and deliver controlled substances knowing and intending that the controlled substances would be unlawfully imported into the United States, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 952(a), 959, and 960;

In violation of Title 21, United States Code, Section 963.

### **COUNT THREE**

The SPECIAL JANUARY 2015 GRAND JURY further charges:

Beginning no later than in or about 2011, and continuing until in or about April 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WALTER PACHECO TREJOS (a/k/a "Lucas Arqui"), and ANDRES MAURICIO LEBRE ALVARADO (a/k/a "AM"),

defendants herein, did conspire with Heriberto Zazueta Godoy (a/k/a "Capi Beto"), Individual A, Individual B, Individual C, and with persons known and unknown to the Grand Jury, to commit offenses in violation of Title 18, United States Code, Section 1956, namely:

1. to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, namely felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling, importation, and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful

activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

2. to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside of the United States with the intent to promote the carrying on of a specified unlawful activity, namely felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling, importation, and otherwise dealing in a controlled substance, in violation of Title 18, United States Code, Section 1956(a)(2)(A); and

3. to transport, transmit, and transfer a monetary instrument and funds involving the proceeds of specified unlawful activity, namely, felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling, importation, and otherwise dealing in a controlled substance, from a place in the United States to or through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of

the proceeds, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

## **FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2015 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1), 846, and 963, as set forth in this Superseding Indictment,

WALTER PACHECO TREJOS (a/k/a "LUCAS ARQUI"),  
ANDRES MAURICIO LEBRE ALVARADO (a/k/a "AM"), and  
JUAN CARLOS ESPINOZA DE LOS MONTEROS DEL RINCON  
(a/k/a "JC"),

defendants herein, shall forfeit to the United States of America any property that constitutes and is derived from proceeds traceable to the offense, and any personal property used or intended to be used to commit the offense, as provided in Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h), as set forth in this Superseding Indictment,

WALTER PACHECO TREJOS (a/k/a "LUCAS ARQUI"), and  
ANDRES MAURICIO LEBRE ALVARADO (a/k/a "AM"),

defendants herein, shall forfeit to the United States of America any and all right, title and interest they may have in property, real or personal, involved in such offense, or any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1).

3. The property to be forfeited includes, but is not limited to, a personal money judgment in an amount equal to the proceeds derived from the offenses in violation of Title 21, United States Code, Sections 841(a)(1), 846, and 963, and Title 18, United States Code, Section 1956(h), estimated to be approximately \$58,000,000.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

---

FOREPERSON

---

UNITED STATES ATTORNEY